

Jennifer J. Middleton, OSB # 071510
jmiddleton@justicelawyers.com
Caitlin V. Mitchell, OSB # 123964
cmitchell@justicelawyers.com
JOHNSON, JOHNSON, LUCAS & MIDDLETON, PC
975 Oak Street, Suite 1050
Eugene, OR 97401-3124
Phone: 541/683-2506
Fax: 541/484-0882

Whitney Stark, OSB # 090350
whitney@albiesstark.com
Albies & Stark, LLC
210 SW Morrison Street, Suite 400
Portland OR 97204-3189
Phone: 503/308-4770
Fax: 503/427-9292

Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

JENNIFER JOY FREYD,

Plaintiff,

vs.

**UNIVERSITY OF OREGON, MICHAEL
H. SCHILL and HAL SADOFSKY,**

Defendants.

Case No. 6:17-CV-00448-MC

**DECLARATION OF NICHOLAS B.
ALLEN IN SUPPORT OF
PLAINTIFF'S MOTION FOR
RELIEF FROM THE JUDGMENT**

I, Nicholas B. Allen, declare as follows:

1. I am a full professor of Psychology at the University of Oregon and one of the comparators in Professor Freyd's case.

2. I submitted a declaration at the summary judgment stage of this case at the request of the Office of General Counsel. Although all the information in that declaration was factual, due to the specific nature of the request it was limited in scope and did not reflect my full views on the matters before the court. Also, at that time I was not aware of the extent to which my declaration would be used polemically against Prof. Freyd and her case. If I had known, I would not have provided it.

3. I submit this declaration to provide the full context to the court, explain in more detail my views on Prof. Freyd's case and our compensation system in the United States and at the University of Oregon.

4. Attached hereto as exhibit 1 is a slightly revised version (i.e., a few typographical and grammatical errors in the original version have been corrected) of a letter that I sent to an organization that is preparing an amicus brief for the appeal of Dr. Fryed's case. I also shared this letter with all my colleagues in the department of Psychology.

I declare under penalty of perjury of the laws of the State of Oregon that the foregoing is true and correct.

Dated: September 8, 2019



Nicholas B. Allen